

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate	)	CG Docket No. 17-59
Unlawful Robocalls	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97

**REPLY COMMENTS OF SIRIUS XM RADIO INC.**

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## TABLE OF CONTENTS

I. Introduction and Summary .....	1
II. The Record Demonstrates a Need for More Clarity and Commission Guidance.....	2
A. The Commission Should Reset Its Focus to Illegal Calls, Not Vague and Subjective Notions of “Unwanted” Calls .....	2
B. The Commission Must Provide Additional Guidance for Carrier Call Blocking Programs .....	6
III. The Commission Should Task an Advisory Committee With Working Through Key Issues.....	10
IV. Conclusion .....	12

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To: The Commission

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Sirius XM Radio Inc. (“Sirius XM”) hereby submits reply comments in response to the Commission’s Third Further Notice of Proposed Rulemaking (“*Third Further Notice*”) in the above-captioned proceedings.<sup>1</sup>

**I. INTRODUCTION AND SUMMARY**

While Sirius XM and all stakeholders support eliminating illegal robocalls, the record shows that the Commission should provide guidance ensuring that carriers are not hindering or blocking calls that are needed, wanted, or are otherwise permitted communications.<sup>2</sup> In particular, commenters expressed significant concern about the Commission’s deference to each carrier’s own judgement as to what calls it will block, as well as allowing calls to be blocked that although legal, might be “unwanted” in that carrier’s subjective view. The Commission instead should redirect its efforts to stopping illegal calls, and should not (and cannot) permit carriers to

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC 19-51 (rel. June 7, 2019) (“*Declaratory Ruling*” and “*Third Further Notice*”).

<sup>2</sup> *See, e.g.*, Comments of Sirius XM Radio Inc., CG Docket No. 17-59, WC Docket No. 17-97, at 1-2 (filed July 24, 2019) (“Sirius XM Comments”).

block calls by default unless those calls are likely to be illegal, based on uniform, nationwide standards.

The record also shows that callers, carriers, and consumers alike would benefit from additional Commission guidance in related areas. The Commission specifically should provide guidance regarding standardized notices to consumers, notices to blocked callers, and redress for improperly blocked calls, among other SHAKEN/STIR and associated call-blocking program implementation issues. The best mechanism to move the process forward may be for the Commission to task an advisory committee comprised of stakeholders from across the ecosystem with resolving the myriad difficult issues that remain. The Commission then, informed by the recommendations made by the cross-sectional advisory committee, can provide the guidance critical to ensuring that lawful calls will not be blocked and that effective notice and remedial procedures are in place, thereby enabling carriers in turn to take even more aggressive steps to stop unlawful calls. But until such guidance is effective, the Commission should not allow carriers to offer blocking on an opt-out basis as allowed in the *Declaratory Ruling*.

## **II. THE RECORD DEMONSTRATES A NEED FOR MORE CLARITY AND COMMISSION GUIDANCE**

### **A. The Commission Should Reset Its Focus to Illegal Calls, Not Vague and Subjective Notions of “Unwanted” Calls**

The *Declaratory Ruling*, though well-intentioned, represented a hasty and ill-advised step in the wrong direction in the Commission’s efforts to combat robocalls by deferring to each carrier’s own, nearly unfettered judgement of which legal but “unwanted” calls a carrier can block and proposing special protections for only certain legal calls based on their content.<sup>3</sup> “Unwanted” is a highly subjective, easily misunderstood, and possibly unlawful standard to

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<sup>3</sup> *Id.* at 8-10.

apply to call blocking. The Commission should redirect its efforts to define the types of calls that can be blocked rather than delegating that responsibility to individual carriers, and permit carriers to block only the calls that can cause consumers harm—illegal calls—instead of allowing blocking based on any subjective standards.

Many stakeholders raise these same concerns. ACA International, for instance, explains that many years of confusion over the term “robocall” has now evolved into a discussion of what is “unwanted” or “wanted,” but neither the Commission nor SHAKEN/STIR defines those subjective terms.<sup>4</sup> The Competitive Carriers Association correctly observes that “varying definitions of ‘unwanted’ calls may lead to widely varying examples of providers inadvertently blocking ‘wanted’ calls.”<sup>5</sup> TransNexus suggests further that such a “completely subjective” determination can only be made by the call recipient.<sup>6</sup> Meanwhile, the Massachusetts Department of Telecommunications and Cable calls into question call-blocking based on “irrelevant characteristics or opinions of the caller, the content of the call, or the call recipient,”<sup>7</sup> *i.e.*, subjective criteria that do not pertain to a call’s legality.

While consumers themselves should have the ability to decide which calls they should and should not receive, the risks associated with the Commission’s preferred approach raise questions as to its desirability. For example, a consumer choosing to block calls from all

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<sup>4</sup> Comments of ACA International, CG Docket No. 17-59, WC Docket No. 17-97, at 5-6 (filed July 24, 2019) (“ACA International Comments”).

<sup>5</sup> Comments of the Competitive Carriers Association, CG Docket No. 17-59, WC Docket No. 17-97, at 3 (filed July 24, 2019) (“CCA Comments”); *see also* Comments of Sprint Corporation, CG Docket No. 17-59, WC Docket No. 17-97, at 8 (filed July 24, 2019) (noting there is no universal agreement on what is a wanted or unwanted call, or even a legal or illegal call).

<sup>6</sup> Comments of TransNexus, CG Docket No. 17-59, WC Docket No. 17-97, at 6 (filed July 24, 2019) (“TransNexus Comments”).

<sup>7</sup> Comments of the Massachusetts Department of Telecommunications and Cable, CG Docket No. 17-59, WC Docket No. 17-97, at 7 (filed July 24, 2019) (“MDTC Comments”).

numbers except those on a personal contact list may not fully understand that this choice will cause him or her to miss essential calls from hospitals, credit card fraud units, schools, police, etc. At minimum, consumers must be fully informed of the risks and impacts of their blocking choices.<sup>8</sup>

But beyond showing that “unwanted” is too vague a standard to block calls, the record also shows it is an inappropriate one. Voice service providers should not be making unilateral decisions to intentionally block *any* legal calls, whether assumed or assessed to fall into the “unwanted” category. In fact, the Commission cannot lawfully authorize the blocking of legal calls in the first instance, as several commenters note.<sup>9</sup> And even if it could authorize carriers to block legal calls, it would be inappropriate to do so as a policy matter. As the Voice on the Net Coalition states, “all legitimate calls should be terminated at their desired end point,”<sup>10</sup> rather than just those that are “critical” or meet some other criteria. Even a coalition of consumer

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<sup>8</sup> See, e.g., Comments of the AARP, CG Docket No. 17-59, WC Docket No. 17-97, at 2 (filed July 24, 2019) (“AARP Comments”) (“[C]onsumer protection and education are imperative. New choices, such as opt-out blocking services and opt-in white lists should be fully explained to consumers, including the potential consequences of adopting, or not adopting, the new technologies.”); Letter from Bob Gallman, President/CEO, Louisiana Credit Union League, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 17-59, WC Docket No. 17-97, at 2 (filed May 30, 2019) (“We are concerned that consumers will have insufficient information regarding the consequences of blocking all calls except those on their personal white list or contacts list. For example, members who applied for loans and need to be called by loan officers may not have those loan officers’ numbers stored in their phones. This would effectively block credit union calls from reaching members that have opted-in.”).

<sup>9</sup> See, e.g., Comments of the Credit Union National Association, CG Docket No. 17-59, WC Docket No. 17-97, at 10 (filed July 24, 2019) (“CUNA Comments”); Comments of the American Dental Association, CG Docket No. 17-59, WC Docket No. 17-97, at 1 (filed June 28, 2019).

<sup>10</sup> Comments of the Voice on the Net Coalition, CG Docket No. 17-59, WC Docket No. 17-97, at 3 (filed July 24, 2019); see also Comments of the American Association of Healthcare Administrative Management, CG Docket No. 17-59, WC Docket No. 17-97, at 1 (filed July 24, 2019) (“AAHAM Comments”) (noting that the Commission’s rules must ensure that legitimate organizations may continue to place lawful calls without the threat of overbroad blocking).

groups that historically have sought broad restrictions on companies' abilities to make telemarketing and other calls to consumers<sup>11</sup> asserts that any call blocking safe harbor should apply only to calls in which the voice service provider has "very high confidence are illegitimate."<sup>12</sup>

To that end, as part of any rules adopted pursuant to the *Third Further Notice*, many stakeholders understandably ask the Commission to walk back or delay the effectiveness of the *Declaratory Ruling*, which authorized an ill-defined and overbroad approach to blocking so-called "unwanted" robocalls.<sup>13</sup> These stakeholders urge the Commission instead to focus its blocking policies on calls that fail authentication measures or otherwise are likely to be "illegal," rather than calls that a particular voice provider (or even the Commission) subjectively determines to be "unwanted."<sup>14</sup> Sirius XM supports this shift in approach.

The Commission should take the opportunity presented by the *Third Further Notice* to clarify that its anti-robocall efforts address only calls likely to be illegal. The Commission

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<sup>11</sup> See, e.g., Comments of National Consumer Law Center, *et al.*, CG Docket No. 02-278, CG Docket No. 18-152 (filed June 13, 2018); Comments of Consumers Union, CG Docket No. 02-278, CG Docket No. 18-152 (filed June 13, 2018); Comments of Consumer Action, CG Docket No. 17-59, CG Docket No. 18-152 (filed June 11, 2018).

<sup>12</sup> Comments of Consumer Reports, *et al.*, CG Docket No. 17-59, WC Docket No. 17-97, at 8 (filed July 24, 2019) ("Consumer Groups Comments"); see also Comments of West Telecom Services, LLC, CG Docket No. 17-59, WC Docket No. 17-97, at 5-6 (filed July 24, 2019) ("West Comments") (stating that default analytics-based call blocking should only target illegal calls).

<sup>13</sup> See, e.g., AAHAM Comments at 2-3; Comments of American Bankers Association, *et al.*, CG Docket No. 17-59, WC Docket No. 17-97, at 4 (filed July 24, 2019) ("ABA, *et al.* Comments"); ACA International Comments at 8-9; Comments of the Consumer Bankers Association, CG Docket No. 17-59, WC Docket No. 17-97, at 1 (filed July 24, 2019); Comments of the PRA Group, CG Docket No. 17-59, WC Docket No. 17-97, at 1-2 (filed July 24, 2019) ("PRA Group Comments"); Comments of TCN Inc., CG Docket No. 17-59, WC Docket No. 17-97, at 5-6 (filed July 24, 2019) ("TCN Comments").

<sup>14</sup> See, e.g., AAHAM Comments at 4; ACA International Comments at 5; see also Consumer Groups Comments at 8.

should also clarify that carriers may not block legal calls based on the carrier's subjective notions of what consumers do or do not want. All default opt-out call blocking programs should seek exclusively to identify and block *illegal* robocalls, which is already a difficult task, before accounting for criteria designed to determine consumers' individual or collective preferences.<sup>15</sup> Further, as described below, the Commission also must provide guidance to providers about how to identify which calls are likely to be illegal and therefore can be blocked.

**B. The Commission Must Provide Additional Guidance for Carrier Call Blocking Programs**

The record also emphasizes the necessity for standardized blocking, notice, and redress mechanisms. Callers, carriers, and consumers alike would benefit from additional Commission guidance to ensure that lawful calls are not unreasonably blocked. By codifying call-blocking policies in clear rules, the Commission “would simplify regulatory compliance burdens for all stakeholders.”<sup>16</sup> Additional Commission guidance also would help to ensure that fewer lawful calls are blocked and that mechanisms exist to quickly and effectively mitigate any such blocking when it happens. To that end, the record includes thoughtful suggestions for the Commission to enact regarding (i) blocking standards, (ii) notice to consumers, (iii) notice to callers, and (iv) redress mechanisms, concepts that Sirius XM supports.

*Blocking Standards.* The Commission should establish clear standards defining which calls voice service providers can permissibly block and which calls they cannot,<sup>17</sup> and, as discussed above, those standards must focus on distinguishing likely illegal calls from legal ones.

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<sup>15</sup> See, e.g., Comments of First Orion Corp., CG Docket No. 17-59, WC Docket No. 17-97, at 6 (filed July 24, 2019) (“First Orion Comments”) (observing that failed authentication as a proxy for “illegal” is under-inclusive as well as overinclusive).

<sup>16</sup> TCN Comments at 6.

<sup>17</sup> Sirius XM Comments at 7.



Adopting clear, uniform, and nationwide standards would avoid inconsistent and unpredictable practices that will vary by provider.<sup>18</sup> Because of this need for uniformity, the Commission must take a more active role in defining objective call blocking standards and criteria, particularly for calls to be blocked through opt-out-based call blocking programs.<sup>19</sup>

Commenters in the record offer suggestions for the types of objective factors the Commission could adopt, and voice service providers could apply, to inform call blocking decisions. For instance, West observes that illegal calls are largely those that originate overseas but have spoofed U.S. numbers.<sup>20</sup> NTCA—The Rural Broadband Association proposes a safe harbor covering calls that have some indicia of a maliciously altered or inserted certificate.<sup>21</sup> And NCTA—The Internet & Television Association suggests that any safe harbor should cover the blocking of calls that, among other things, fail authentication or are unexpectedly unsigned.<sup>22</sup> In the end, it is the Commission’s responsibility—not that of individual carriers—to identify the factors that define whether a call may or may not be blocked. In its efforts to identify these

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<sup>18</sup> See notes 5 *supra* and accompanying text; see also Comments of Securus Technologies, Inc., CG Docket No. 17-59, WC Docket No. 17-97, at 3 (filed July 24, 2019). Indeed, since consumers often use different providers for their wireless and wireline services, allowing providers to determine their own standards could lead to the absurd result of the same call being blocked on a consumer’s wireless phone but not on the same consumer’s landline phone.

<sup>19</sup> While opt-in programs also can lead to overblocking—and the Commission should be careful that such programs do not block calls consumers want, raise competitive concerns, or create other issues—such programs merit some additional flexibility in that consumers will presumably be clearly and fully informed of overblocking risks before they affirmatively make their choices. See also, *e.g.*, TransNexus Comments at 1-3 (asserting that providers should let customers decide call blocking policies rather than by default).

<sup>20</sup> West Comments at 5-6.

<sup>21</sup> Comments of NTCA—The Rural Broadband Association, CG Docket No. 17-59, WC Docket No. 17-97, at 10-13 (filed July 24, 2019) (“NTCA Comments”).

<sup>22</sup> Comments of NCTA—The Internet & Television Association, CG Docket No. 17-59, WC Docket No. 17-97, at 9-10 (filed July 24, 2019).

factors, the Commission should assess the reliability of SHAKEN/STIR as an indicator of potentially illegal calls,<sup>23</sup> as well as other factors the Commission endorses to provide more clarity regarding what calls can and cannot be blocked.

*Notice to Customers.* Any blocking program—opt-out or opt-in—must be coupled with notice given to all customers effectively informing them of the risk that call blocking will inadvertently impact wanted or needed calls and how to change their call blocking settings. As Professional Credit Service notes, a website click-through notice is not sufficient to provide consumers with actual, informed notice.<sup>24</sup> Instead, stakeholders urge the Commission to impose more specific requirements, such as mandating a mechanism to ensure that consumers have actually received notice of the disclosure<sup>25</sup> or standardized notifications (including standardized error codes).<sup>26</sup> Several commenters, including the AARP and Massachusetts Department of Telecommunications and Cable, also urge the Commission to consider requiring that voice service providers' websites and mobile apps include a way for customers to check blocked calls and control certain blocking settings.<sup>27</sup> The Commission ultimately must ensure that consumers

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<sup>23</sup> Compare, e.g., Comments of Comcast Corporation, CG Docket No. 17-59, WC Docket No. 17-97, at 7 (filed July 24, 2019) (stating that SHAKEN/STIR enables voice providers to distinguish fraudulently spoofed calls from those where caller ID information was changed for legitimate reasons), with Comments of AT&T Services, Inc., CG Docket No. 17-59, WC Docket No. 17-97, at 5, 8 (filed July 24, 2019) (stating that SHAKEN/STIR information alone is not enough to determine whether or not a call is legitimate), and with Comments of INCOMPAS, CG Docket No. 17-59, WC Docket No. 17-97, at 7-8 (filed July 24, 2019) (noting that SHAKEN/STIR authentication can fail legitimate calls for several reasons).

<sup>24</sup> See, e.g., Comments of Professional Credit Service, CG Docket No. 17-59, WC Docket No. 17-97, at 1-2 (filed July 24, 2019).

<sup>25</sup> Securus Comments at 2.

<sup>26</sup> AARP Comments at 5, 8. The AARP suggests further that the Commission establish a working group to develop the basic design elements of display information. *Id.* at 7.

<sup>27</sup> See, e.g., *id.* at 8; MDTC Comments at 4, 6.

are fully informed of the impact their call blocking settings will have on their ability to receive needed, wanted, and other legal calls and in order to do so, it must provide more guidance to voice providers than it has provided to date.

*Notice to Callers.* Sirius XM explained that call blocking programs must have a mechanism for callers to be notified immediately in instances where their calls are blocked, for instance, through the use of intercept messages and/or SIP codes.<sup>28</sup> Numerous commenters agree,<sup>29</sup> and some assert a need to standardize the notice.<sup>30</sup> The Commission should require any call blocking program to include a standardized real-time notice to callers about blocked calls; providing such notice must be a prerequisite of any safe harbor the Commission adopts.<sup>31</sup>

*Redress Mechanisms.* In its initial comments, Sirius XM suggested that carriers should have specific redress mechanisms, such as dedicated employees to promptly address and resolve overblocking complaints and a requirement to remedy complaints within two business days.<sup>32</sup> Numerous other commenters likewise emphasize the importance of redress mechanisms as part of any call blocking safe harbor,<sup>33</sup> as well as the need for further Commission guidance on what

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<sup>28</sup> See Sirius XM Comments at 7.

<sup>29</sup> See, e.g., ACA International Comments at 10-12; AAHAM Comments at 6; CUNA Comments at 6; Comments of Noble Systems Corporation, CG Docket No. 17-59, WC Docket No. 17-97, at 3, 9-10, 20); TCN Comments at 2-3.

<sup>30</sup> See, e.g., Consumer Groups at 7 (asserting there should be a standard notification to callers whose calls are intercepted); CUNA Comments at 5.

<sup>31</sup> At minimum, any such message must inform the caller, either verbally or through some other mutually-understood means, that (a) the call is being blocked, (b) who is doing the blocking, and (c) whom the caller can contact if it believes the call is being blocked in error. It is ineffective—and indeed misleading—to provide a tone or voice message informing the caller only that the line is busy or out of service or simply that the call did not go through.

<sup>32</sup> Sirius XM Comments at 7.

<sup>33</sup> See, e.g., ACA International Comments at 10-12; AAHAM Comments at 5; CUNA Comments at 5-6; NTCA Comments at 14-15; TCN Comments at 3; see also Comments of the Electronic

it means to provide effective redress.<sup>34</sup> The record includes suggestions such as requiring a 24/7 point of contact listed on providers' websites,<sup>35</sup> a 24-hour mitigation requirement,<sup>36</sup> and cost-free challenge mechanisms.<sup>37</sup> At bare minimum, the Commission should require providers to establish and adhere to clear policies and procedures for promptly addressing and remedying erroneously blocked calls within a short timeframe,<sup>38</sup> and it should retain an oversight and enforcement role when those policies and procedures break down.<sup>39</sup>

### **III. THE COMMISSION SHOULD TASK AN ADVISORY COMMITTEE WITH WORKING THROUGH KEY ISSUES**

The record clearly shows the Commission must address many hard questions before taking its next steps, which in turn must provide carriers, callers, and consumers with additional clarity and guidance. In particular, the record includes many difficult technical and operational questions with regard to SHAKEN/STIR implementation and associated call-blocking programs that, even though technical, still require Commission insight and direction.<sup>40</sup> Accordingly, the

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Transactions Association, CG Docket No. 17-59, WC Docket No. 17-97, at 2 (filed July 24, 2019) ("ETA Comments").

<sup>34</sup> See, e.g., Comments of RingCentral, Inc., CG Docket No. 17-59, WC Docket No. 17-97, at 9-10 (filed July 24, 2019) ("RingCentral Comments").

<sup>35</sup> See, e.g., ACA International Comments at 10-13.

<sup>36</sup> See, e.g., Comments of Encore Capital Group, Inc., CG Docket No. 17-59, WC Docket No. 17-97, at 4 (filed July 24, 2019); PRA Group Comments at 2-3.

<sup>37</sup> See, e.g., ACA International Comments at 10-13.

<sup>38</sup> See, e.g., AAHAM Comments at 5; ABA, *et al.*, Comments at 5-6.

<sup>39</sup> See, e.g., ACA International Comments at 13; AAHAM Comments at 6-7; ETA Comments at 3; *see also* TCN Comments at 4-5 (suggesting that the burden before the Commission should be on the voice provider to explain why it believed the call should be illegal).

<sup>40</sup> See, e.g., Comments of Cloud Communications Alliance, CG Docket No. 17-59, WC Docket No. 17-97, at 8 (filed July 24, 2019) (expressing caution until standards and best practices concerning the signing of enterprise-originated calls have been adopted and proven workable); First Orion Comments at 3-4 (noting continued challenges after SHAKEN/STIR deployment); Comments of Larimer Emergency Telephone Authority, CG Docket No. 17-59, WC Docket No. 17-97, at 1-2 (filed July 24, 2019) (suggested that the Commission should not implement

best mechanism to move forward may be for the Commission to establish a process for stakeholders from across the ecosystem—including carriers, callers, consumer groups, and public safety representatives—to work together and resolve the myriad difficult issues that remain. For instance, an advisory committee could be tasked with assessing:

- What if any standards and best practices exist for determining the calls that are likely to be illegal, as well as what gaps exist that should be addressed;
- What sort of notice would most effectively inform consumers of calls that are being blocked by default, their options for changing the degree of call blocking they want, the risks of blocking needed, wanted, and other legal calls, etc.;
- Whether and what different blocking standards and policies would be appropriate for opt-out blocking compared to opt-in blocking, as well as whether the same (or different) standards should apply to call labeling<sup>41</sup>;
- The best way to deliver an intercept message to notify callers (or their providers) in real time that their calls are being blocked, while providing sufficient information so that legitimate callers can take immediate steps to stop any unnecessary blocking;
- What operational processes may be feasible for carriers—large and small—to implement so that callers can obtain rapid redress for overblocking;
- What aspects of call blocking, notice, and redress require more uniformity and standardization and which can be implemented differently on a provider-by-provider basis without deleteriously impacting legitimate callers;
- To the extent the Commission pursues its Critical Call List proposal, the operational requirements needed for an entity to operate, control, and protect the list, how numbers can be added to or taken off of the list, as well as any viable alternatives to reach the same goal; and

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authentication requirements until after thorough testing and vetting); RingCentral Comments at 5-7 (suggesting that the Commission should prioritize helping to resolve SHAKEN/STIR implementation challenges); CCA Comments at 3 (noting that the *Declaratory Ruling* leaves open questions surrounding implementation).

<sup>41</sup> Sirius XM previously explained that labeling calls can be tantamount to blocking. *See* Sirius XM Comments at 4, n. 9 (citing Comments of Sirius XM Radio Inc., CG Docket No. 17-59, at 5-6 (Jan. 23, 2018); *see also* First Orion Comments at 8 (“[L]abels have a powerful effect.”). Accordingly, the Commission and any advisory committee it tasks with addressing call blocking concerns also should focus on and address the concerns related to inappropriate call labeling.

- What the Commission’s role in overseeing call blocking programs should be versus what can be addressed via industry standards and best practices.

Establishing an advisory committee (or relying on an existing one) to address these questions would allow the Commission to continue to encourage industry progress in stopping illegal robocalls, while also creating a venue for the Commission, consumer groups, callers, and other stakeholders to work collaboratively with carriers in addressing remaining open questions.<sup>42</sup> Moreover, since these important items require careful consideration—and erroneous implementation could cause significant harm to all users of the telephone network—the Commission should also delay the effectiveness of any authorization in its *Declaratory Ruling* allowing carriers to offer opt-out blocking until after the Commission adopts rules addressing each of these issues.

#### IV. CONCLUSION

Sirius XM and virtually all commenters in this proceeding support the Commission’s goal of stopping illegal robocalls. The record makes clear, however, that the Commission should ensure that its policies do not inadvertently block the transmission of lawful calls that are needed, wanted, or permitted. The Commission could best encourage progress on stopping illegal robocalls while protecting lawful calls by tasking a broad-based advisory committee with addressing many of the remaining key implementation and operational issues while

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<sup>42</sup> The Commission’s Consumer Advisory Committee (“CAC”) is apparently already considering some issues raised in the *Third Further Notice*. See Public Notice, *FCC Announces the Next Meeting of the Consumer Advisory Committee*, DA 19-782, at 1 (rel. Aug. 16, 2019) (“At its September 16, 2019 meeting, the Committee is expected to consider a recommendation presented by its Critical Calls List/Robocall Blocking Working Group relative to the [*Third Further Notice*]”). While the scope and extent the CAC’s involvement in this proceeding is unclear, Sirius XM is encouraged by the prospect that the CAC may already be working on at least some of these critical issues.

simultaneously delaying carriers' authority to provide call blocking on an opt-out basis until after the advisory committee's and the Commission's review of these issues has been completed.

Respectfully submitted,

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